

1 CAROLYN A. DYE (SBN 97527)
2 15030 Ventura Boulevard
3 Suite 527
4 Sherman Oaks, CA 91403
5 Telephone: 818/287-7003
6 Facsimile: 323/987-5763
7 Email: trustee@cadye.com

8 Chapter 7 Trustee

9

10

11

12

13 UNITED STATES BANKRUPTCY COURT

14 CENTRAL DISTRICT OF CALIFORNIA

15 LOS ANGELES DIVISION

16

17

18

19 In re) Case No. 2:17-bk-10861-WB
20 SOPHONNA NONG,) [Chapter 7]
21)
22 Debtor.) TRUSTEE'S NOTICE OF INTENTION
23) TO ADMINISTER FUNDS RECEIVED
24) FROM RECEIVERSHIP PROCEEDING
25)
26) [No Hearing Unless Requested;
27) Local Bankruptcy Rule 6007-1]
28)
29 _____)

30 TO THE HONORABLE JULIA W. BRAND, UNITED STATES BANKRUPTCY JUDGE,
31 THE UNITED STATES TRUSTEE, DEBTOR, ALL CREDITORS AND OTHER
32 PARTIES IN INTEREST:

33 PLEASE TAKE NOTICE that Carolyn A. Dye, Chapter 7 Trustee
34 ("Trustee") for the estate of Sophonna Nong ("Debtor"), proposes
35 to administer funds distributed on account of a claim filed in
36 the Receivership proceeding initiated by the Securities and
37 Exchange Commission proceeding in which Thomas Seaman was
38 appointed as permanent receiver. Although a claim for \$23,325 was
39 filed in the Receivership, the distribution to the estate was

1 only \$9,974.25.

2 The factual background for the Receivership is as follows:
3 On December 8, 2016, the United States District Court for the
4 Central District of California, granted the SEC's motion for
5 summary judgment against Steve Chen and his affiliated companies,
6 including USFIA, finding him liable on all of the claims asserted
7 against him. The Court found that Chen: (1) ran USFIA as a
8 fraudulent pyramid scheme; (2) sold investors securities, whether
9 characterized as investment contracts or pyramid scheme
10 transactions, which were not registered with the SEC; (3) those
11 sales were made though interstate commerce; (4) defrauded
12 investors by failing to advise them that the pyramid scheme was
13 destined to collapse; (5) made five material misrepresentations
14 to investors in connection with the sale of the securities; (6)
15 misused investor funds to fund a lifestyle that included multiple
16 million-dollar mansions and luxury automobiles for him and his
17 family; (7) acted with a high degree of scienter; (8)
18 orchestrated the pyramid scheme over many years; and (9) showed
19 no recognition of wrongdoing and no assurance against future
20 violations. The Receivership liquidated various assets and
21 established a fund for payment of claims to those who invested
22 with Chen.

23 Debtor listed this claim in her amended Schedules B and C
24 and claimed an exemption for \$15,000 under Section Cal.C.Civ
25 Pro., Section 703.140(b)11 for that amount.

26 None of the exemptions available under C.C.P. Section
27 703.140(b)11 apply to the funds recovered and, thus, Trustee
28 contends no exemption is available. Having investigated the

1 nature of the Debtor's claim, the proceedings in the Receivership
2 and the creditors' claim in this case, Trustee proposes to
3 administer these funds for the benefit of the creditors of this
4 estate.

5 PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy
6 Rule 6007-1, the Trustee will take the proposed action without
7 further hearing or order of the Court unless a timely objection
8 or request for a hearing is filed by an interested party no later
9 than fourteen (14) days from the date of service of this Notice,
10 plus an additional three (3) days unless the notice of motion was
11 served by personal delivery or posting as described in F.R.Civ.P
12 5(b) (2) (A)-(B). Any objection or request for a hearing must be in
13 writing and must be filed with the United States Bankruptcy
14 Court, 255 East Temple Street, Room 100, Los Angeles, CA 90012,
15 and served upon Trustee at the address in the upper left hand
16 corner of the first page this Notice and upon the Office of the
17 United States Trustee at 915 Wilshire Blvd., Suite 1850, Los
18 Angeles, CA 90017. A hearing will then be set by Trustee.

19 Unless objections are timely filed and served, Trustee will
20 proceed to administer these funds.

21
22
23 Dated: December 29, 2022


24 Carolyn A. Dye, Chapter 7 Trustee
25
26

27 Service Date: December 29, 2022
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 15030 Ventura Boulevard, Suite 527, Sherman Oaks, CA 91403.

A true and correct copy of the foregoing document entitled Notice of Trustee's Intention to Administer Funds Received from Receivership Proceeding will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On December 29, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

| | |
|----------------------------|--|
| William Patrick Andrews | askbk@resurgent.com |
| Joseph C Delmotte | ecfcacb@aldridgeppte.com, JCD@ecf.inforuptcy.com; |
| Carolyn A Dye (TR) | jdelmotte@aldridgeppte.com |
| Merdaud Jafarnia | trustee@cadye.com, c197@ecfcbis.com;atty@cadye.com |
| Valerie Smith | bknotice@mccarthyholthus.com, mjafarnia@ecf.inforuptcy.com |
| United States Trustee (LA) | claims@recoverycorp.com |
| Brad Weil | ustpregion16.la.ecf@usdoj.gov |
| Bethany Wojtanowicz | bfweil@justbradlegal.com, brad@ecf.courtdrive.com; |
| | frontdeskweillaw@gmail.com |
| | bethanyw@w-legal.com, BNC@w-legal.com |

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On December 29, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY - N/A: Pursuant to Fed.R.Civ.P. 5 and/or controlling LBR, on _____, 2022, I arranged for service on the following person as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Karissa De La Trinidad

Dated: December 29, 2022

Los Angeles Division
155 East Temple Street,
Los Angeles, CA 90012-3332

Doc 87 Filed 12/29/22 Entered 12/29/22 15:04:09 Desc
Dumas & Kim, APC Main Document Page 5 of 5 Prometheus Health Imaging, Inc.
DUMAS & KIM, APC.
915 Wilshire Blvd
Ste. 1775
Los Angeles, CA 90017-3575
269 S. Beverly Dr.
Suite 1800
Beverly Hills, CA 90212-3851

Accounts Receivable Acquisitions
Mena City Lawyers
Tilal Bldg Block A7-Ashrafieh Street
PO Box 135113
Beirut, Downtown Lebanon

Ali Nasih Mohsen
c/o Wassim Abou Nader, Esq.
Office 510 Arab Bank Bldg.
Riad El Solh
Beirut, Downtown Lebanon

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS A340
PO BOX 2952
SACRAMENTO CA 95812-2952

GE Medical Systems
c/o Philippe Glaser
Avocat Au Barreau De Paris
42 Avenue Montaigne, 75008
Paris, France

GE Medical Systems Europe
Steven A. Friedman, Esq.
Squire Patton Boggs
4900 Key Tower 127 Public Square
Cleveland, OH 04414

Iihad Mohamad Khalil
c/o Wassim Abou Nader, Esq.
Office 510 Arab Bank Bldg.
Riad El Solh
Beirut, Downtown Lebanon

Nadim Nimir Yassin
c/o Wassim Abou Nader, Esq.
Office 510 Arab Bank Bldg.
Riad El Solh
Beirut, Downtown Lebanon

Phillippe Glasser (GE Medical Systems)
42 Avenue Montaigne 75008
Paris, France

Steven A. Friedman Esq (GE Medical Systems)
900 Key Tower 127 Public Square
Cleveland, OH 04414

United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017-3560

Carolyn A Dye (TR)
Law Offices of Carolyn Dye
15030 Ventura Blvd., Suite 527
Sherman Oaks, CA 91403-5470

David M Browne
David M Browne
1900 Burbank Blvd Ste 112
Woodland Hills, CA 91367-7927

| | |
|---------------------|----|
| End of Label Matrix | |
| Mailable recipients | 15 |
| Bypassed recipients | 0 |
| Total | 15 |